

HARDIN, LEFTON, LAZARUS & MARKS, LLC

ATTORNEYS AND COUNSELORS AT LAW

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September 10, 2003


James Schwantes, Esq.
119 East Court Street
Suite 500
Cincinnati, Ohio 45202

Re: Shirdenia Bryant

Dear Jim:

This is a follow up to a request for documents discussed at Ms. Bryant's deposition. We are requesting copies of her complete federal income tax returns, including schedules, for the years 1997 to 2002. Although Ms. Bryant testified that she cannot access her returns because she has been locked out of her storage facility for failure to pay, she can obtain copies of the returns from the IRS. Please have your client obtain these copies and forward them to my office.

Sincerely,


Gary R. Lewis

GRL/ds
cc: Prescott Bigelow
Roseanne Christian

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September 2, 2003

William H. Blessing, Esq.
119 East Court Street
Suite 500
Cincinnati, Ohio 45202

Re: Bryant v. Bigelow, et al.
Case Number: C-1-02-006

Dear Bill:

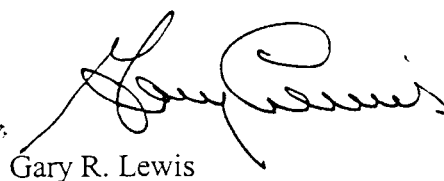
This will follow the documents we discussed at the deposition of Harry Curtis.

Please provide me with copies of the following:

- 1) Mr. Curtis' Resume containing his employment history as discussed at the deposition;
- 2) Mr. Curtis' Federal Income Tax Returns, including all schedules, from 1998 to present;

I also want to obtain copies of his medical records from the VA. Enclosed is an authorization which will allow that information to be released to me. Please have your client sign this and return it to me at your earliest convenience.

Sincerely,



Gary R. Lewis

GRL/ds
Enclosure
cc: Prescott Bigelow
Roseanne Christian
(w/o encl.)

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September 12, 2003

William H. Blessing, Esq.
119 East Court Street
Suite 500
Cincinnati, Ohio 45202

Re: Bryant v. Bigelow, et al.
Case Number: C-1-02-006

Dear Bill:

This is a follow-up to my previous letter to you dated September 2, 2003. As of the date of this writing, I have not yet received the documents we discussed at the deposition of Harry Curtis and referenced in my September 2, 2003 letter. Please get these documents to me no later than September 19, 2003.

Sincerely,

Gary R. Lewis

GRL/ds

cc: Prescott Bigelow
Roseanne Christian

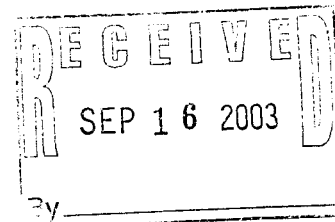
EXHIBIT D

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September 15, 2003



Gary R. Lewis, Attorney
Hardin, Lefton, Lazarus & Marks, LLC
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915 Cincinnati Club Building
30 Garfield Place
Cincinnati, Ohio 45202-4322

Re: *Bryant v. Bigelow, et al.*

Dear Gary:

I have your September 10, 2003 letter, written to James Schwantes and requesting Shirdenia Bryant's federal income tax returns from 1997 through 2002. You also sent me a September 2, 2003 letter, asking for Harry Curtis' tax returns from 1998 to the present. At this point I cannot think of a claim or defense in this case that has any relevance to their tax returns. Please give me some kind of explanation how Harry's and Shirdenia's returns could contain relevant information or likely lead to the discovery of admissible evidence.

Sincerely yours,

Bill Blessing
William H. Blessing

WHB/

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September 19, 2003

William H. Blessing, Esq.
119 East Court Street
Suite 500
Cincinnati, Ohio 45202

Re: Bryant v. Bigelow, et al.
Case Number: C-1-02-006

Dear Bill:

This is a follow-up to my previous letters to you dated September 2, 2003 and September 12, 2003. Regarding the tax returns of your clients, Harry Curtis and Shirdenia Bryant, they are discoverable and should be produced. Your clients' financial status, including their ability (or inability) to meet their financial obligations concerning their real estate are clearly at issue. Their income and expenses are relevant. They have also provided deposition testimony as to their financial status, which was often vague. Please produce these documents. Also, I have still not received Mr. Curtis' employment resume. Please respond to this request as well.

Sincerely,

Gary R. Lewis

GRL/ds
cc: Prescott Bigelow
Roseanne Christian